

**GOTTLIEB & ASSOCIATES**  
ATTORNEYS

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May 22, 2023

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Hedges v. UMZU LLC*,  
Case No.: 1:23-cv-2902

Dear Judge Schofield,

The undersigned represents Donna Hedges, on behalf of herself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, RC Visions LLC, ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for May 31, 2023, at 4:20 PM (Dkt. 6) be adjourned for 60 days because Counsel for Defendant has not yet answered or appeared in this action. Additionally, the undersigned respectfully requests Your Honor grant the Defendant an extension of time to respond to the complaint until June 21, 2023, so that the Defendant has ample opportunity to appear and defend themselves in this Action. This request will grant ample time for the Defendant to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an extension.

Application GRANTED in part and DENIED in part. The initial pretrial conference scheduled for May 31, 2023, is adjourned to **June 14, 2023, at 4:20 P.M.** If Plaintiff is in communication with Defendant, the parties shall file the joint letter and proposed case management plan as soon as possible and no later than **June 7, 2023**. If Plaintiff is not in communication with Defendant, no later than **June 7, 2023**, Plaintiff shall file a status letter (1) requesting further adjournment of the initial conference for up to 30 days and (2) proposing a date prior to the conference to present an Order to Show Cause for default judgment as to Defendant and related papers as provided in the Court's Individual Rules. Once Defendant appears, it may request an extension of time to answer, move, or otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

GOTTLIEB & ASSOCIATES

/s/Michael A. LaBollita, Esq.  
Michael A. LaBollita, Esq.

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Dated: May 23, 2023  
New York, New York